

EXHIBIT A

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AFFIDAVIT OF SPECIAL AGENT LOUIS J. TENORE

I, Louis J. Tenore, a Special Agent with the United States Drug Enforcement Administration (“DEA”), depose and state as follows:

1. I have been a DEA Special Agent since April 2004. In that capacity, I have worked numerous investigations regarding drug trafficking and money laundering, resulting in millions of dollars of seizures of United States currency and assets tied to drug crimes. I have been assigned to DEA New Bedford Resident Office since 2017. Since that time, I have been assigned to the Heroin Enforcement Group, where I investigate drug trafficking and money laundering. From 2004 to 2016, I was assigned to DEA New York Field Division. I hold graduate degrees in Criminal Justice from Stonehill College.

2. I submit this affidavit in support of a Verified Complaint for Forfeiture *in Rem* against the following asset:

- a. \$50,060.00 in United States currency seized in Fairhaven, Massachusetts on May 3, 2022 (the “Currency”).

3. This affidavit does not contain all of the information known to me and other law enforcement officers regarding this investigation, but only those facts sufficient to establish probable cause for forfeiture of the Currency.

4. This affidavit is based on my personal involvement in the investigation, my review of evidence and reports, my training and experience, and my conversations with other law enforcement officers and witnesses.

5. As set forth in more detail below, I have probable cause to believe that the Currency is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6) because it

represents moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. §§ 841 and/or 846, proceeds traceable to such an exchange, and/or moneys, negotiable instruments, or securities used or intended to be used to facilitate such a violation.

SEIZURE OF THE CURRENCY

6. On May 3, 2022, at approximately 1:50pm, Task Force Officer (TFO) Jerald Bettencourt and I, while at the DEA New Bedford Resident Office, received a telephone call from detectives from the Fairhaven Police Department. I was advised that the detectives had detained three individuals at the Walmart in Fairhaven, MA, who they believed were involved in a pending narcotics transaction. The detectives further indicated that they seized a small amount of crack cocaine and located a suitcase containing of United States currency. The detectives stated that were contacting the DEA to see if the DEA had any information about the three individuals.

7. The detectives provided the names of the individuals detained, who were William Northway, Courtney Wilson, and a third individual. I learned through checking a DEA database that Northway had been investigated by the DEA's Chicago Division Office in 2020 and was a resident of Chicago. Per the DEA, Northway was arrested in 2020, and, following the execution of a search warrant on his vehicle resulting from a traffic stop, the DEA seized multiple pounds of marijuana, miscellaneous chemicals, and \$8,340.00 of U.S. currency.

8. TFO Bettencourt and I then went to the location to assist in the investigation. At the scene, we were briefed on the events leading up to the stop. The detectives advised that they were patrolling merchant parking lots in Fairhaven to identify and interdict illegal drug activity

and, in the past, had made many arrests for illegal drug use and distribution within merchant parking lots in Fairhaven.

9. On May 3, 2022, while observing the Walmart parking lot in Fairhaven, a lieutenant from the Bristol County Sheriff's Office, assigned to the Fairhaven police department, observed a Toyota Camry bearing Ohio Registration HPU4763 that was occupied by two males. The two males were identified as Northway, who was operating the vehicle, and Courteney Wilson, who was the passenger. Detectives had observed the two males looking around extensively as they checked their phones. A short time later, both Northway and Wilson were observed exiting the Camry and entering the passenger side of a Jeep Grand Cherokee bearing Massachusetts registration 1KML29. The operator of the Jeep Grand Cherokee was a female who is the daughter of the registered owner of the Jeep Grand Cherokee.

10. After approximately a half hour of sitting in the Jeep Grand Cherokee, Northway exited the vehicle and returned to the Camry where he retrieved a medium-sized blue suitcase out of the trunk and returned to the Jeep Grand Cherokee. Northway entered the front passenger seat of the Jeep with the suitcase. Detectives then approached the Jeep Grand Cherokee at which time the lieutenant observed a small clear glass jar with what appeared to be crystalized substance believed to be crack cocaine inside the vehicle. Northway was asked to exit the Jeep Grand Cherokee. Two detectives observed the other two individuals inside the Jeep Grand Cherokee. Fairhaven Detective Marc Darmofal observed the suitcase in the passenger side of the Jeep Grand Cherokee partially opened with what appeared to be a bundle of United States currency inside.

11. I was further advised that at this time all individuals were removed from the vehicle and detained pending further investigation. A field test of the of the abovementioned

substance tested positive for cocaine base product. All subjects were advised of their Miranda rights and refused to answer any questions. Detective Darmofal advised that law enforcement was applying for Massachusetts state search warrants for both vehicles (the Camry and the Jeep Grand Cherokee).

12. While in the parking lot, TFO Bettencourt and I spoke with all three individuals regarding the suitcase and the currency located inside it. Each individual denied ownership of the suitcase and the currency inside. Northway further stated to me that he found the suitcase with the currency, and that he was going to pay taxes on it. Northway would not provide any detail to me about where he found the currency or when he found the currency or why, as a resident of Chicago, he was in Massachusetts.

13. Subsequent to the seizure, several calls were placed to the Fairhaven Police Department from the registered owner of the Jeep Grand Cherokee, the daughter of the registered owner of the Jeep Grand Cherokee, and Courteney Wilson (who had rented the Camry). These calls were recorded. I have reviewed the recorded calls as well as spoken with the detectives involved in the investigation. During these calls, the registered owner of the Jeep Grand Cherokee asked about the vehicle and why it was seized, the daughter of the registered owner asked for her return of her property, and Wilson asked about his phone and how to talk to Enterprise rental car company because they were charging him by the day for the rental car (the Camry) and he wanted to stop being charged. Northway, as far as I am aware, never attempted to contact the Fairhaven Police department for any reason. At no time did Wilson or any other individual request the return of the suitcase with the Currency.

14. Based on my training and experience, I believe that the out of state plate, the movements of the vehicle within the lot, and the moving of the suitcase from one vehicle to the

other indicated that an illegal drug activity was occurring in the parking lot. Additionally, the way the currency was bundled was indicative of illegal drug activity. Currency concealed inside a suitcase with innocuous items can indicate an attempt to conceal the currency from law enforcement interdiction. Additionally, the banded currency indicates the currency was separated into specific amounts to facilitate easier accountability and transfer. See below photos.





15. On June 30, 2022, the DEA initiated administrative forfeiture of the Currency; however, the DEA was unable to effectuate proper notice to Courteney Wilson at that time because it could not verify that the notice sent had been received. The DEA sent additional notices to Courteney Wilson on July 22, 2024 and October 15, 2024, and received confirmation of receipt by Courteney Wilson on October 19, 2024.

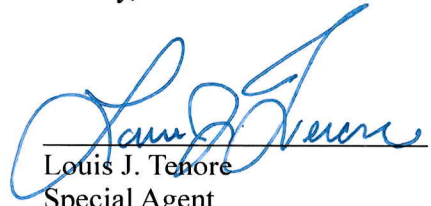
16. On October 21, 2024, the DEA received a claim filed by Courteney Wilson pursuant to the Civil Asset Forfeiture Reform Act of 2000, seeking the return of the Currency, and the DEA referred the matter to the United States Attorney's Office for the District of Massachusetts.

CONCLUSION

17. Based on the foregoing, there is probable cause to believe that the Currency is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6) because it represents moneys, negotiable instruments, securities or other things of value furnished or intended to be

furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. §§ 841 and/or 846, proceeds traceable to such an exchange, and/or moneys, negotiable instruments, or securities used or intended to be used to facilitate such a violation.

Signed under the penalties of perjury this 16th day of January, 2025.



Louis J. Tenore
Special Agent
Drug Enforcement Administration